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JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No: 2:23-CR-0162-DAD
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO CONTINUE
)	STATUS CONFERENCE AND EXCLUDE
JORGE OMAR ARREDONDO-GARCIA, et)	TIME
al.,)	
Defendant.)	District Judge Dale A. Drozd
)	New Date: November 21, 2023
)	Time: 9:30 a.m.
)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK MCCARTHY, attorney for Defendant JORGE OMAR ARREDONDO-GARCIA; CANDICE FIELDS and DAVID FISCHER, attorneys for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant, JOSE MANUEL ONTIVEROS VERDUGO; TASHA PARIS CHALFANT, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for August 29, 2023, be continued to Tuesday, November 21, 2023 at 9:30 a.m., and that time be excluded for preparation of counsel.

The indictment in this matter was filed on June 29, 2023. Doc. 25. The final Defendant, Jose Manuel Ontiveros Verdugo, just made his first appearance on July 21, 2023. (Doc. 51.) The government has produced discovery that consists of approximately 700 pages of Bates-

1 stamped documents and over 72.8 gigabytes of native files, including cell phone databases and
 2 other items for defense review, all covered by a protective order.

3 Since the start of the case, Defense counsel have been reviewing and analyzing the above,
 4 conducting legal research, meeting with their clients, and otherwise preparing for trial. The
 5 above tasks are ongoing, and the defense requires additional time to review discovery, discuss
 6 the case with their clients and the Government, and continue to prepare. The parties believe that
 7 failure to grant the requested continuance would deny defense counsel the reasonable time
 8 necessary for effective preparation, taking into account the exercise of due diligence.

9 Accordingly, the parties stipulate and request that the Court exclude time between the date of the
 10 filing of this stipulation through the new status conference date of November 21, 2023 under 18
 11 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice
 12 served by continuing the case as requested outweigh the interest of the public and the defendant
 13 in a trial within the original date prescribed by the Speedy Trial Act.

14 Date: August 22, 2023

15 /s/ Patrick McCarthy
 16 PATRICK McCARTHY
 17 Attorney for Defendant
 18 JORGE OMAR ARREDONDO-GARCIA

19 /s/ Candice Fields
 20 CANDICE FIELDS
 21 DAVID FISCHER
 22 Attorneys for Defendant
 23 GREGORIO ONTIVEROS VERDUGO

24 HEATHER E. WILLIAMS
 25 Federal Defender

26 /s/ Rachelle Barbour
 27 RACHELLE BARBOUR
 28 Attorney for Defendant
 JOSE MANUEL ONTIVEROS VERDUGO

/s/ Tasha Paris Chalfant
 TASHA PARIS CHALFANT
 Attorney for Defendant
 ALBERTO NAVARRO ZAPATA

/s/ Michael Long
MICHAEL LONG
Attorney for Defendant
WILFREDO F. REYES

DATED: August 22, 2023

PHILLIP A. TALBERT
United States Attorney

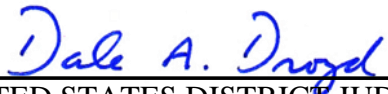
/s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney
Attorney for the United States

O R D E R

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: August 22, 2023


UNITED STATES DISTRICT JUDGE